

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION.

Case No. 4:22-MD-03047-YGR (PHKx)
MDL No. 3047

THIS DOCUMENT RELATES TO ALL
ACTIONS

**STIPULATION AND [PROPOSED]
ORDER REGARDING MARKING
DEPOSITION EXHIBITS**

1 **WHEREAS**, the parties have met and conferred regarding a protocol for marking
 2 deposition exhibits as contemplated by the *Stipulation and Order Governing Protocol for Fact*
 3 *Discovery and Rule 30(b)(6)/PMQ Depositions* (ECF 742) at paragraph II (N)(7).

4 **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between the parties hereto
 5 through their respective attorney of record that for each Defendant Group (Meta,
 6 TikTok/ByteDance, Snap and YouTube/Google) or Third-Party, documents will be marked
 7 sequentially within each deposition starting with Exhibit 1, and because of the number of
 8 depositions anticipated, the parties agree that there is no need to mark exhibits sequentially across
 9 depositions. Exhibits shall be marked at depositions as follows:

- 10 • For depositions of Plaintiffs' fact witnesses and for case-specific third-party
 11 witnesses (e.g., treating physicians): "[Plaintiff Last Name / School District / State],
 12 Witness Name¹, Exhibit Number". For example, "Doe-Jane Doe-1", 2, 3, etc. and
 13 "Doe-James Doe-1", 2, 3, etc.
- 14 • For depositions of Defendants' fact witnesses: "Defendant Group Name, Witness
 15 Last Name, Exhibit Number". For example, "Meta-Smith-1", 2, 3, 4, etc. and
 16 "TikTok-Smith-1", 2, 3 etc.

17 This Stipulation and Order Regarding Marking Deposition Exhibits ("Order") shall govern
 18 the conduct of fact as well as Fed. R. Civ. P. 30(b)(6)/PMQ depositions for all cases currently in
 19 MDL No. 3047 ("MDL") and hereafter added or transferred to MDL No. 3047, all cases currently
 20 in California JCCP No. 5255 ("JCCP") and hereafter added or transferred to JCCP No. 5255, and
 21 any deposition that is originally noticed in the MDL or JCCP and cross-noticed by parties in Related
 22 Actions.²

23 [SIGNATURE BLOCKS ON THE NEXT PAGE]

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26 ¹ Where counsel is aware at the time of the deposition that there will be multiple deponents
 27 with the same last name in a specific case, counsel shall endeavor to mark exhibits with either
 28 each witness's full name or sufficient initials to distinguish the witnesses from one another.

2 ² For purposes of this Order, "Related Actions" shall have the same meaning as in the *Stipulation and*
Order Governing Protocol for Fact Discovery and Rule 30(b)(6)/PMQ Depositions (ECF 742).

1 Dated: July 8, 2024

2 Respectfully submitted,

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15 **IT IS SO ORDERED** that the foregoing Stipulation is approved.

16 DATED: July __, 2024

17

18 HONORABLE PETER H. KANG
19 United States District Court Magistrate Judge

ATTESTATION

I, Andrea R. Pierson, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: July 8, 2024

s/ Andrea R. Pierson
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